



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: TWO RIVERS LUMBER CO., INC.

FACILITY NAME: TWO RIVERS LUMBER – DEMOPOLIS FACILITY

FACILITY/PERMIT NO.: 105-S007

LOCATION: DEMOPOLIS, MARENGO COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, <u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, <u>Ala. Code</u> §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date: DRAFT

Effective Date: DRAFT

Expiration Date: DRAFT

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Federally Enforceable Provisos	Regulations
1. <u>Transfer</u>	
This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code r. 335-3-1613(1)(a)5.	ADEM Admin. Code r. 335-3-1602(6)
2. Renewals	
An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code r. 335-3-1612(2)
The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. Severability Clause	
The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code r. 335-3-1605(e)
4. Compliance	
(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code r. 335-3-1605(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code r. 335-3-1605(g)

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	General Permit Provisos			
	Federally Enforceable Provisos	Regulations		
	5. <u>Termination for Cause</u>			
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code r. 335-3-1605(h)		
	6. Property Rights			
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code r. 335-3-1605(i)		
	7. Submission of Information			
	The permittee must submit to the Air Division, within 30 days or for such other reasonable time as the Air Division may set, any information that the Air Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Air Division copies of records required to be kept by this permit.	ADEM Admin. Code r. 335-3-1605(j)		
8.	Economic Incentives, Marketable Permits, and Emissions Trading			
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code r. 335-3-1605(k)		
	9. Certification of Truth, Accuracy, and Completeness			
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	ADEM Admin. Code r. 335-3-1607(a)		
	10. Inspection and Entry			
	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	ADEM Admin. Code r. 335-3-1607(b)		

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General Permit Provisos	
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(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. Compliance Provisions	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. Compliance Certification	
The permittee shall submit a complete and accurate compliance certification by January 29 th of each year for each annual reporting period of this permit (XXX XX th – XXX XX th).	
(a) The compliance certification shall include the following:	
(1) The identification of each term or condition of this permit that is the basis of the certification;	
(2) The compliance status;	
(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-1605(c) (Monitoring and Recordkeeping Requirements);	
(4) Whether compliance has been continuous or intermittent	
(5) Such other facts as the Air Division may require to determine the compliance status of the source;	

General	Permit	Provisos

Federally Enforceable Provisos

Regulations

(b) The compliance certification shall be submitted to:

Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463

and to:

Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303

13. Reopening for Cause

Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:

ADEM Admin. Code r. 335-3-16-.13(5)

- (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
- (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

14. Additional Rules and Regulations

This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

§22-28-16(d), <u>Code of Alabama 1975</u>, as amended

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Federally Enforceable Provisos Regulations 15. Equipment Maintenance or Breakdown (a) In case of shutdown for more than one (1) hour of air pollution ADEM Admin. Code r. 335-3-1-.07(1),(2) control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Air Division at least (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following: (1) Identification of the specific facility to be taken out of service as well as its location and permit number; (2) The expected length of time that the air pollution control equipment will be out of service; (3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period; (4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; (5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period. (b) In the event that there is a breakdown of equipment or upset of process for a period exceeding one (1) hour in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected. 16. Operation of Capture and Control Devices All air pollution control devices and capture systems for which §22-28-16(d), Code of

this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly

operated and maintained so as to minimize the emission of air contaminants shall be established.

Alabama 1975, as amended

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Federally Enforceable Provisos Regulations 17. Obnoxious Odors This permit is issued with the condition that, should obnoxious ADEM Admin. Code r. 335-3-1-.08 odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible. 18. Fugitive Dust (a) Precautions shall be taken to prevent fugitive dust emanating ADEM Admin. Code r. from plant roads, grounds, stockpiles, screens, dryers, 335-3-4-.02 hoppers, ductwork, etc. (b) Plant or haul roads and grounds shall be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds: (1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; (2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; (3) By paving; (4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions. Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization. 19. Additions and Revisions Any modifications to this source shall comply with the ADEM Admin. Code r. modification procedures in Rules 335-3-16-.13 or 335-3-16-.14. 335-3-16-.13 and 335-3-16-.14

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Federally Enforceable Provisos Regulations 20. Recordkeeping Requirements (a) Records of required monitoring information of the source shall ADEM Admin. Code r. include the following: 335-3-16-.05(c)2. (1) The date, place, and time of all sampling measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement. (b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit. 21. Reporting Requirements ADEM Admin. Code r. (a) Reports to the Air Division of any required monitoring shall be submitted at least every 6 months. All instances of deviations 335-3-16-.05(c)3. from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code r. 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of said deviations, and any corrective actions or preventive measures that were taken. 22. Emission Testing Requirements ADEM Admin. Code r. Each point of emission which requires testing shall be provided with sampling ports, ladders, platforms, and other safety 335-3-1-.05(3) and equipment to facilitate testing performed in accordance with 335-3-1-.04(1) procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

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Federally Enforceable Provisos	Regulations		
The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.			
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	ADEM Admin. Code r. 335-3-104		
(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.			
(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).			
(c) A description of the process(es) to be tested including the feed			

A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and

rate, any operating parameters used to control or influence

the operations, and the rated capacity.

downstream gas flow disturbances.

ADEM Admin. Code r. 335-3-1-.04

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.

23. Payment of Emission Fees

(a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-7-.04 according to the schedule in ADEM Admin. Code r. 335-1-7-.05.

ADEM Admin. Code r. 335-1-7-.05

(b) The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-7-.05. ADEM Admin. Code r. 335-1-7-.05

General Permit Provisos	
Federally Enforceable Provisos	Regulations
24. Other Reporting and Testing Requirements	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.	ADEM Admin. Code r. 335-3-104(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.	ADEM Admin. Code r. 335-3-1605(a)
No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.	
The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR §82.166. Reports shall be submitted to the US EPA and the Department as required.	
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:	40 CFR Part 68
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.	
(b) The owner or operator shall submit one of the following:	
(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a) or,	
(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	

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General Permit Provisos			
Federally	Enforceable Provisos	Regulations	
27. Display of Permit			
the site where the facility	ot under file or on display at all times at y for which the permit is issued is located nit readily available for inspection by any request to see it.	ADEM Admin. Code r. 335-3-1401(1)(d)	
28. Circumvention			
device or any means whethe total amount of air of	or permit the installation or use of any ich, without resulting in the reduction in contaminant emitted, conceals or dilutes taminant which would otherwise violate regulations.	ADEM Admin. Code r. 335-3-110	
29. Visible Emissions			
permit, any source of p more than one 6-minute 60-minute period. At 6-minute average opacit 40%. Opacity will be det	ied in the Unit Specific provisos of this articulate emissions shall not discharge average opacity greater than 20% in any no time shall any source discharge a ty of particulate emissions greater than termined by 40 CFR Part 60, Appendix A, rise specified in the Unit Specific provisos	ADEM Admin. Code r. 335-3-401(1)	
30. Fuel-Burning Equip	ment_		
permit, no fuel-burning	ied in the Unit Specific provisos of this g equipment may discharge particulate he emissions specified in ADEM Admin.	ADEM Admin. Code r. 335-3-403	
permit, no fuel-burning	ied in the Unit Specific provisos of this equipment may discharge sulfur dioxide he emissions specified in ADEM Admin.	ADEM Admin. Code r. 335-3-501	
31. Process Industries -	- General		
permit, no process may	ied in the Unit Specific provisos of this discharge particulate emissions in excess d in ADEM Admin. Code r. 335-3-404.	ADEM Admin. Code r. 335-3-404	
32. Averaging Time for	Emission Limits		
	ed in the permit, the averaging time for in this permit shall be the nominal time test method.	ADEM Admin. Code r. 335-3-105	

General Permit Provisos			
Federally Enforceable Provisos	Regulations		
33. Open Burning			
Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.	ADEM Admin. Code r. 335-3-301		

Emission Unit No. 001 (Sawmill and Green End Operations) Summary Page

Description: Green End Operations [Log Debarker (LD-1), Log Bucking (LB-1), Bark

Hog (BH-1), and mechanical conveyors to the Bark Storage Bin (BSB-

1)]

Sawmill (SM-1), Sawmill Chipper (SC-1), and mechanical conveyors to

the Sawdust and Chip Storage Bins (SDSB-1 & CSB-1)

Truck loadout operations for storage bins (BSB-1. SDSB-1, & CSB-1)

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

Emission limitations:

Emission Point ID	Description	Pollutant	Emission limit	Regulation
LD-1				
LB-1				
BH-1	Fugitive Emissions			
SM-1		DI / A	NI / A	DI / A
SC-1		N/A	N/A	N/A
BSB-1				
SDSB-1				
CSB-1				

Emission Unit No. 001 (Sawmill and Green End Operations) Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
2.	Emission Standards	
	(a) This process shall not discharge particulate emissions more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall this process discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9	ADEM Admin. Code. r. 335-3-401
3.	Compliance and Performance Test Methods and Procedures	
	(a) If testing is required, the particulate emission rate from this process shall be determined in accordance with Method 5 at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-105
	(b) If testing is required, the emissions of PM_{10} and $PM_{2.5}$ from this unit shall be determined in accordance with EPA Reference Methods 201A and 202.	ADEM Admin. Code r. 335-3-105
	(c) If testing is required, the emissions of total particulate matter from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9	
4.	Emission Monitoring	
	(a) While each process is operating, someone familiar with the process shall observe the debarker (LD-1), log bucking (LB-1), bark hog (BH-1), mechanical conveyors to the bark storage bin (BSB-1), sawmill (SM-1), sawmill chipper (SC-1), mechanical conveyors to the sawdust and chip storage bin (SDSB-1/CSB-1), and truck loadout operations from the storage bins (BSB-1/SDSB-1/CSB-1) a minimum of once weekly during daylight hours for greater than normal emissions as determined by previous observations.	ADEM Admin. Code r. 335-3-1605(c)
	(b) Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.	ADEM Admin. Code r. 335-3-1605(c)

Federally Enforceable Provisos	Regulations
5. Recordkeeping and Reporting Requirements	
(a) The permittee shall maintain records of emission monitoring performed in a permanent form suitable for inspection, upon request, and on-site for at least five (5) years from the date of generation of each record. These records shall include:	ADEM Admin. Coder. 335-3-1605(c)
 The date, time, and results of each weekly observation for greater than normal visible emissions; 	
 The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed; 	
3)	
(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st).	ADEM Admin. Code r. 335-3-1605(c)
 A statement as to whether all observations for greater than normal visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed; 	
2) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed or (2) an inspection of the emission points indicated that cleaning or emissions-related maintenance was needed.	

Emission Unit Nos. 002 & 003 [Two (2) Continuous Direct-Fired Kilns] Summary Page

Description:

15.4 MBF/hr Continuous, Dual Path Direct-Fired Lumber Dry Kiln (DPK-1) with 38.8 MMBtu/hr Natural Gas-Fired Burner and associated 4 MMBtu/hr Natural Gas-Fired Kiln Condensate Evaporator (CE-1)

15.4 MBF/hr Continuous, Dual Path Direct-Fired Lumber Dry Kiln (DPK-2) with 38.8 MMBtu/hr Natural Gas-Fired Burner and associated 4 MMBtu/hr Natural Gas-Fired Kiln Condensate Evaporator (CE-2)

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DPK-1	Fugitivo Emissiona	VOC	3.80 lb/MBF (VOC as Carbon)	PSD/BACT
DPK-2	Fugitive Emissions	РМ	1.30 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
CE-1 CE-2		DM	0.07 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
	Fugitive Emissions	PM	$E = 1.38H^{0.44}$	ADEM Admin. Code r. 335-3-403 (SIP)

Emission Unit Nos. 002 & 003 [Two (2) Continuous Direct-Fired Kilns] Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	(a) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b) This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))".	ADEM Admin. Code r. 335-3-1404
	(c) These units are subject to the applicable requirements of 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD.	ADEM Admin. Code r. 335-3-1106(81) and 335-3-1106(1)
2.	Emission Standards	
	(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from DPK-1 or DPK-2 in excess of the amount determined by the following equation:	ADEM Admin. Code r. 335-3-404
	E = 3.59 P 0.62 (P < 30 TPH)	
	Or	
	E = 17.31 P 0.16 (P ≥ 30 TPH)	
	where	
	E = Emissions in pounds per hour	
	P = Process weight in tons per hour.	
	(b) The permittee shall not cause or allow particulate emissions from either natural gas burner (CE-1 or CE-2) to exceed the allowable emission rate as calculated using the following equation:	ADEM Admin. Code r. 335-3-403
	$E = 1.38H^{-0.44}$	
	Where E = Emissions in lb/million BTU	
	H = Heat Input in millions of BTU/hr	

	Federally Enforceable Provisos	Regulations
	(c) The permittee shall not cause or allow the volatile organic compound (VOC) emissions from each kiln to exceed 3.80 lb/MBF (measured as carbon).	ADEM Admin. Code r. 335-3-1404
	(d) The Permittee shall not cause or allow the particulate matter emission rate from the kiln to exceed 1.30 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5. Alternate test methods may be used provided prior approval by the Air Division is granted.	ADEM Admin. Code r. 335-3-1404
	(e) The Permittee shall not cause or allow the particulate matter emission rate from the evaporator to exceed 0.07 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5. Alternate test methods may be used provided prior approval by the Air Division is granted.	ADEM Admin. Code r. 335-3-1404
	(f) The permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-401
3.	Compliance and Performance Test Methods and Procedures	
	(a) If testing is required, the VOC emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A. An alternative test method may be utilized provided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	(b) Opacity of stack emissions shall be determined in accordance with Method 9 at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-105
	(c) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.	
4.	Emissions Monitoring	
	(a) The permittee shall follow proper maintenance and operating practices as recommended by the manufacturer, which include but may not be limited to the following:	ADEM Admin. Code r. 335-3-1605(c)
	1) Proper operation practices:	

- i. Operate kilns within a target temperature range of 220°F to 260°F depending on the dimensions of lumber being dried. Kiln temperature is the average of multiple continually monitored dry bulb measurements. Kiln temperature exceeding 260°F will result in a kiln shutdown. Records of high temperature shutdowns are maintained by the facility. Air Division should be notified within 48 hours or two (2) working days of shutdowns due to high temperature;
- ii. Lumber should be dried to a target moisture of 10% or greater. The moisture content of finished lumber will be automatically measured at the infeed of the grader for the Planer Mill. Moisture content measurements below 10% will be flagged in the data collection system. Records of average moisture content per production run below 10% will be maintained by the facility. Production runs with average moisture content below 10% will be reported to the Air division within 48 hours or two (2) working days.

2) Proper maintenance practices

- i. Conduct daily routine maintenance to include cleaning debris from around kiln and pusher tracks, and visually inspect the primary air fan, gas train, and gas burner on the kiln burner;
- ii. Conduct weekly inspections of fan drives, belts, kiln fan shafts, cart pusher hydraulics fluid level, and routine maintenance to include the greasing kiln fan shafts, leak checks on hydraulics and connections:
- iii. Conduct quarterly inspections of plenum hatched, cleaning as necessary;
- iv. Conduct semiannual routine maintenance to include inspect fan bearings and grease as necessary, replace hydraulic filter on kiln cart pusher hydraulics, grease kiln cart pusher axial bearing and wheels, inspect baffles and brushes, and grease primary air fan electric motors on the kiln burner.
- v. Conduct annual routine maintenance to include grease kiln fan and cart pusher hydraulics electric motors, lubricate hinges on door baffles and man doors, hinge and linkage lubrication on kiln vents, complete natural gas system inspection of gas train and gas burner on the kiln burner.

Federally	Enforceable	Provisos
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Regulations

(b) Within ten (10) days of the end of each calendar month, the Permittee shall calculate the total combined throughput for DPK-1 and DPK-2 for the previous calendar month and the previous 12-month period.

ADEM Admin. Code r. 335-3-16-.05(c)

5. Recordkeeping and Reporting Requirements

- (a) The permittee shall maintain records documenting its compliance with the proper operating and maintenance, and maintain records of the combined throughput for DPK-1 and DPK-2 on a monthly and 12-month rolling total basis.
- **(b)** The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five years from the date of generation of each record.
- (c) If these kilns should exceed an applicable limit at any time, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.
- (d) The permittee shall submit a Semiannual Monitoring Report for these kilns to the Air Division as part of the Semiannual Monitoring Report as required by General Permit Proviso No. 21(a), shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). This report shall include a certification that all emission monitoring and recordkeeping was accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished

Emission Unit No. 004 (Planer Mill Operations) Summary Page

Description: Planer Mill (PM-1) Operations with a Shavings Storage Bin (SSB-1) and a Cyclofilter (CF-1) [SMS]

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
CF-1	Cyclofilter	PM	E = $3.59(P)^{0.62}$ for P<30 TPH Or E = $17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r. 335-3-404
			0.048 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)

Emission Unit No. 004 (Planer Mill Operation) Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b) This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))".	ADEM Admin. Code r. 335-3-1404
2.	Emission Standards	
	(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each of these units in excess of the amount determined by the following equation:	ADEM Admin. Code r. 335-3-404
	$E = 3.59 \ P^{0.62} \ (P < 30 \ TPH)$	
	Or	
	$E = 17.31 \ P^{0.16} \ (P \ge 30 \ \text{TPH})$	
	where $E = \text{Emissions in pounds per hour}$	
	<i>P</i> = Process weight in tons per hour	
	(b) The permittee shall not cause or allow the TSP emissions from this source to exceed 0.048 lb/hr.	ADEM Admin. Code r. 335-3-1404
	(c) The permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-401
3.	Compliance and Performance Test Methods and Procedures	
	(a) If testing is required, the emissions of total particulate matter from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-105
	(b) If testing is required, the emissions of PM_{10} and $PM_{2.5}$ from this unit shall be determined in accordance with EPA Reference Methods 201A and 202.	ADEM Admin. Code r. 335-3-105
	(c) If testing is required, the emissions of total particulate matter from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9	

			Federally Enforceable Provisos	Regulations		
4.	Em	ission	Monitoring			
	(a)	proces exhaus greates	the process is operating, someone familiar with the s shall observe the visible emissions from the cyclofilter at a minimum of once weekly during daylight hours for than normal visible emissions as determined by us observations.	ADEM Admin. Code r. 335-3-1605(c)		
	(b)	from to emissi longer by an	ever observed visible emissions are greater than normal the cyclofilter exhaust, corrective action to minimize ons shall be initiated as soon as practicable but no than 24 hours from the time of the observation, followed additional observation to confirm that emissions are ed to normal.	ADEM Admin. Code r. 335-3-1605(c)		
	(c)	mainte observ of the needed	cyclofilter shall be physically inspected for proper enance at least annually, but more frequently whenever ed visible emissions greater than normal. If the results inspection indicate that the cleaning or maintenance is 1, such action shall be initiated within 24 hours of eting the inspection.	ADEM Admin. Code r. 335-3-1605(c)		
5.	Recordkeeping and Reporting Requirements (a) The permittee shall maintain records of emission monitoring performed in a permanent form suitable for inspection, upon request, and on-site for at least five (5) years from the date of generation of each record. These records shall include:					
				ADEM Admin. Code r. 335-3-1605(c)		
		1)	The date, time, and results of each weekly observation for greater than normal visible emissions;			
		2)	The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed;			
		3)	The date(s) and time the cyclofilter was inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.			
	(b) The permittee shall submit a Semiannual Monitoring Report as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the following information for this emission unit:			ADEM Admin. Code r. 335-3-1605(c)		

Federally Enforceable Provisos Regulations 1) A statement as to whether all observations for greater than normal visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed; 2) A statement as to whether the annual inspection of the cyclofilter was accomplished during the reporting period, and if so, the date and results of the inspection; 3) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed or (2) an inspection of the cyclones indicated that cleaning or emissions-related maintenance was needed.